

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAJOR GEORGE TILLERY,	:	CIVIL ACTION
Petitioner,	:	
	:	
v.	:	
	:	
KENNETH EASON, et al.,	:	No. 20-2675
Respondents.	:	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

1. On June 5, 2020, the Third Circuit granted petitioner Major Tillery leave to file the present successive petition for a writ of habeas corpus. *In re: Major G. Tillery*, C.A. No. 20-1941.

2. On February 5, 2021, the Respondents filed a response to Tillery's pro se petition (ECF No. 13).<sup>1</sup>

3. On June 6, 2021, Tillery filed a reply to the response (ECF No. 16).

4. On December 15, 2021, Respondents filed a motion to stay proceedings for voluntary discovery (ECF No. 23).

5. On January 10, 2022, proceedings were stayed (ECF No. 26).

6. On June 2, 2022, Tillery, through counsel, filed an amended petition for writ of habeas corpus (ECF No. 28).

7. On July 13, 2022, the stay was lifted and Respondents were ordered to respond on or before August 12, 2022 (ECF No. 32).

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<sup>1</sup> The previously assigned assistant district attorney who filed this response is no longer with the District Attorney's Office. This matter was subsequently reassigned to the undersigned.

8. Respondents then filed four motions for extension of time, most recently on February 10, 2023 (ECF No. 46). The Court has granted all the Respondents' motions (ECF Nos. 37, 39, 43, and 48).

9. On March 17, 2023, Tillery, through counsel, filed a motion to take a deposition from Robert Mickens (ECF No. 50). This Court granted that motion, ECF No. 51, and that deposition is scheduled to take place on April 17, 2023.

10. Respondents respectfully request a fifth extension of 35 days to file their response. Respondents request this time so that their response may be informed by and address the deposition as necessary. Thus, this additional time will allow Respondents to prepare an appropriate response within 14 days of the conclusion of the deposition of Mr. Mickens.

WHEREFORE, Respondents respectfully request that they be granted 35 days, until May 1, 2023, to file a response to the amended petition.

Respectfully submitted,

/s/ Shoshana D. Silverstein  
SHOSHANA D. SILVERSTEIN  
Assistant District Attorney  
Federal Litigation Unit

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**ORDER**

**AND NOW**, this                      day of                      , 2023, Respondents' time to file a response to the amended petition for writ of habeas corpus is extended to May 1, 2023.

BY THE COURT:

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LYNNE A. SITARSKI  
UNITED STATES MAGISTRATE JUDGE

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**CERTIFICATE OF SERVICE**

I certify that on March 27, 2023, a copy of the foregoing motion was served on all counsel of record via the Court's electronic filing system.

Respectfully submitted,

/s/ Shoshana D. Silverstein  
SHOSHANA D. SILVERSTEIN  
Assistant District Attorney  
Federal Litigation Unit